UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

RODNEY BARBER
Plaintiff(s)

v. C.A. No. 05-390-T

VERIZON NEW ENGLAND, INC., E
Defendant(s)

MOTION FOR ENTRY OF APPEARANCE PRO HAC VICE

Defendants Verizon New England, Inc., Lorna Deplitch and Joseph Conway hereby moves that Timothy Van Dyck be admitted PRO HAC VICE in the above case as associate trial counsel with local associate counsel identified below, on the following grounds:

- ☒ The case involves the following complex area of the law, employment law, in which Mr. Van Dyck specializes and Mr. Van Dyck is familiar with the matters at issue in this litigation.
- ☒ Counsel's long-standing representation of the client: Verizon New England, Inc.
- ☐ The local trial bar lacks experience in the field of: ____________________.
- ☐ The case involves complex legal questions under the law of a foreign jurisdiction with which: ________________________________counsel is familiar, specifically: ________________________________.
- ☐ The case requires extensive discovery in a foreign jurisdiction convenient to ________________________ counsel as follows:________________________.
- ☒ Other: Defendant specifically hired Mr. Van Dyck for his experience in defending employers in suits of the kind brought by the Plaintiff.

VERIZON NEW ENGLAND, INC.,
ET AL

By their attorney,

____
John D. Doran (#6415)
Edwards & Angell, LLP
2800 Financial Plaza
Providence, RI 02903
Tel. 401-274-9200
Telecopy 401-276-6611

Date: September 28, 2005

ATTORNEY'S CERTIFICATION FOR PRO HAC VICE ADMISSION

I hereby certify as follows:

(1) I certify that I am a member in good standing of the bar of the Commonwealth of Massachusetts, the State of Maine, the United States District Court for the District of Massachusetts, the United States Court of Appeals for the First Circuit and the United States Supreme Court, and that my eligibility to practice before those courts has not been restricted in any way.

(2) I have never been disciplined or sanctioned by any court or other body having disciplinary authority over attorneys and there are no disciplinary proceedings pending against me at this time.

(3) I have never been convicted of any crime other than minor traffic offenses.

(4) During the past 24 months I have been admitted in the following cases in this district: Allen Reynolds v. Fluor Industrial Services, d/b/a, M&IS Security, Fluor Enterprises, Inc., and Louis F. Ward et al. C.A. No. 05-201-T (June 23, 2005); Michael Renzi v. Deloitte & Touche USA LLP, C.A. No. 05-290-T (August 30, 2005).

(5) I understand my obligation to notify this Court immediately of any changed circumstances that affect my answers to the preceding questions.

(6) I have read, acknowledge, and agree to observe and to be bound by the local rules and orders of this Court, including the Rules of Professional Conduct of the Rhode Island Supreme Court, as adopted by this Court as the standard of conduct for all attorneys appearing before it.

(7) For purposes of this case I have associated with local associate counsel identified below, and have read, acknowledge, and will observe the requirements of this Court respecting the participation of local associate counsel, as set out in Local Rule 5, recognizing that failure to do so may result in my being disqualified, either upon the Court's motion or motion of other parties in the case.

I certify that I have read and join in the foregoing motion, and acknowledge and agree to observe the requirements of Local Rule 5 in its entirety and as it relates to the participation and responsibilities of local associate counsel.

Timothy P. Van Dyck
Edwards & Angell, LLP
101 Federal Street
Boston, MA 02110
Tel: (617) 439-4444
Fax: (617) 439-4170

John D. Doran (R.I. Bar No. 6415)
Edwards & Angell, LLP
2800 Financial Plaza
Providence, RI 02903-2499
Tel: (401) 274-9200
Fax: (401) 276-6625

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 28th day of September, 2005, I caused a true copy of the within Motion For Entry of Appearance *Pro Hac Vice* to be served by first class mail, postage prepaid, to the following counsel of record:

Bruce P. Gladstein, Esq.
750 East Avenue
Pawtucket, RI 02860

PRV_754233_1/JDORAN